

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RANDOLPH FRESHOUR and)	
VINCENZO ALLAN, each individually and on)	
behalf of similarly situated individuals,)	
)	
Plaintiffs,)	Case No.: 1:23-cv-02667
)	
v.)	Honorable Virginia M. Kendall
)	
CERENCE INC., a Delaware corporation,)	
)	
Defendant.)	

PROPOSED AGREED DISCOVERY SCHEDULE

In accordance with Judge Maldonado's June 10, 2024 Minute Entry (ECF No. 61), counsel for Plaintiffs Randolph Freshour and Vincenzo Allen and Defendant Cerence Inc. have conferred and formulated the following agreed discovery schedule for consideration by the Court. This proposed schedule incorporates the initial deadlines set forth in the Judge Maldonado's August 25, 2023 Minute Entry (ECF No. 35).

Event	Date
Rule 26(a)(1) Disclosures Exchanged	September 25, 2023
Initial Written Discovery Requests Issued	October 11, 2023
Deadline to Report if Parties Will Request Settlement Conference or Schedule Private Mediation	December 13, 2024
Deadline for Completion of Merits Fact Discovery	July 22, 2025
Class Certification Motion No Later Than	August 22, 2025
Completion of Any Outstanding Class Discovery	60 days after a ruling on Plaintiffs' class certification motion
Dispositive Motions No Later Than	45 days after a ruling on Plaintiffs' class certification motion

Event	Date
Rule 26(a)(2) Expert Disclosure(s) Exchanged By	September 5, 2025
Rebuttal Expert Disclosure(s) Exchanged By	October 20, 2025
Expert Depositions Completed By	December 4, 2025

Dated: July 22, 2024

Respectfully submitted,

/s/ Matthew C. Wolfe

Matthew C. Wolfe
 Amy Y. Cho
 Mehgan E. H. Keeley
 SHOOK, HARDY & BACON LLP
 111 South Wacker Drive, Ste. 4700
 Chicago, IL 60606
 (312) 704-7700
 mwolfe@shb.com
 acho@shb.com
 mkeeley@shb.com

Attorneys for Defendant Cerence Inc.

/s/ Paul T. Geske

Myles McGuire
 Paul T. Geske
 Colin Primo Buscarini
 MCGUIRE LAW, P.C.
 55 West Wacker Drive, 9th Floor
 Chicago, IL 60601
 (312) 893-7002
 mmcguire@mcgpc.com
 pgeske@mcgpc.com
 cbuscarini@mcgpc.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies and states that he caused a true and correct copy of the foregoing **PROPOSED AGREED DISCOVERY SCHEDULE** to be electronically filed with the Court via the Court's CM/ECF system, which will serve notice of filing on all counsel of record.

/s/ Matthew C. Wolfe